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COUNSEL FOR SCOTT M. SEIDEL, TRUSTEE

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

In re:	§	
	§	Case No. 22-31641-mvl-7
GOODMAN NETWORKS, INC.,	§	
	§	(Chapter 7)
Debtor.	§	

SCOTT M. SEIDEL, TRUSTEE, and	§	
GNET ATC, LLC,	§	
	§	
Plaintiffs,	§	
	§	
v.	§	Adv. Proc. No. 23-03072
	§	
18920 NW 11th LLC, <i>et al.</i> ,	§	
	§	
Defendants.	§	

SCOTT M. SEIDEL, TRUSTEE	§	
	§	
Plaintiff,	§	
	§	
v.	§	Adv. Proc. No. 23-03090
	§	
HUDSON CLEAN ENERGY	§	
ENTERPRISES, LLC, <i>et al.</i> ,	§	
	§	
Defendants.	§	

**TRUSTEE’S MOTION TO COMPEL
WRITTEN DISCOVERY RESPONSES AND PRODUCTION OF DOCUMENTS
FROM JAMES GOODMAN, GOODMAN INVESTMENT HOLDINGS, LLC,
GENESIS NETWORKS GLOBAL SERVICES, LLC, PEOPLE NQ, INC., JJC &
PEOPLE, LLC, AND GDMN FAMILY INVESTMENTS 2, LLC**

Scott M. Seidel, the duly-appointed chapter 7 trustee (the “Trustee”) for Goodman Networks, Inc. (the “Debtor”), files this his *Trustee’s Motion to Compel Written Discovery Responses and Production of Documents from James Goodman, Goodman Investment Holdings, LLC, Genesis Networks Global Services, LLC, People NQ, Inc., JJC & People, LLC, and GDMN Family Investments 2, LLC* (the “Motion”), in support of which the Trustee would respectfully show as follows:

For the reasons set forth in the *Brief in Support of Trustee’s Motion to Compel Written Discovery Responses and Production of Documents from James Goodman, Goodman Investment Holdings, LLC, Genesis Networks Global Services, LLC, People NQ, Inc., JJC & People, LLC, and GDMN Family Investments 2, LLC*, as supplemented by the *Appendix in Support of Trustee’s Motion to Compel Written Discovery Responses and Production of Documents from James Goodman, Goodman Investment Holdings, LLC, Genesis Networks Global Services, LLC, People NQ, Inc., JJC & People, LLC, and GDMN Family Investments 2, LLC*, both of which are being filed contemporaneously with this Motion, the Court should overrule the discovery objections of James Goodman, Goodman Investment Holdings, LLC, and Genesis Networks Global Services, LLC and compel them, along with People NQ, Inc., JJC & People, LLC, and GDMN Family Investments 2, LLC, to answer the Trustee’s interrogatories and produce documents in response to his requests for production.

RESPECTFULLY SUBMITTED this 16th day of January, 2025.

MUNSCH HARDT KOPF & HARR, P.C.

/s/ Conor P. White

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**COUNSEL FOR SCOTT M. SEIDEL,
CHAPTER 7 TRUSTEE**

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that he conferred with opposing counsel on December 17 and 18, 2024, regarding the relief requested herein, as required by Rule 37(a)(1), but to date the Defendants have failed to remedy any of the deficiencies described in the Trustee's accompanying brief.

/s/ Conor P. White

Conor P. White, Esq.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on this the 16th day of January, 2025, true and correct copies of this document were electronically served by the Court's ECF system on parties entitled to notice thereof, including on James Goodman, GDMN Family Investments 2, LLC, People NQ, LLC, and JJC & People, LLC through Randy Pulman and Anna MacFarlane, their counsel of record.

/s/ *Conor P. White*

Conor P. White